## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

BIENVENIDO FRANCO, Individually and on	)
Behalf of All Others Similarly Situated,	)
Diain4iff.	) Circ No : 07 CV 2050
Plaintiffs,	) Civ. No.: 07 CV 3956
<b>v.</b>	) (JS/AKT)
	)
IDEAL MORTGAGE BANKERS, LTD. d/b/a	)
LEND AMERICA, INC., MICHAEL ASHLEY	(,)
TIMOTHY MAYETTE, HELENE DECILLIS,	
MICHAEL PRIMEAU,	)
	)
Defendants.	)

## **CONSENT JUDGMENT**

NOW COME Plaintiff BIENVENIDO FRANCO, Individually and on Behalf of All Others Similarly Situated and Defendant MICHAEL ASHLEY, and hereby state and agree as follows:

- 1. Plaintiff, on behalf of himself and 302 loan officers who have filed opt-consent forms ("Plaintiffs") asserts claims for unpaid regular and overtime wages for violations of the Fair Labor Standards Act, 29 U.S.C. 201, *et seq.* ("FLSA") under a three-year statute of limitations.
- 2. The Parties hereby agree to entry of a consent judgment as follows: Judgment is hereby entered against Defendant Michael Ashley and in favor of Plaintiffs for their claims for unpaid regular and overtime wages for violations of the Fair Labor Standards Act, 29 U.S.C. 201, et seq. ("FLSA") in the sum of \$15,200,000.00 under a three-year statute of limitations.

Dated: November 30, 2017 Respectfully Submitted,

/s/ James B. Zouras

James B. Zouras

Ryan F. Stephan (Admitted Pro Hac Vice) STEPHAN ZOURAS, LLP 205 North Michigan Avenue Suite 2560 Chicago, IL 60601 (312) 233-1550 (312) 233-1560 (Fax) jzouras@stephanzouras.com

Erik H. Langeland The Law Offices of Erik H. Langeland 733 3<sup>rd</sup> Avenue, 15<sup>th</sup> Floor New York, NY 10017 (212) 354-6270 (212) 898-9086 (Fax) elangeland@langelandlaw.com

## **COUNSEL FOR PLAINTIFFS**

/s/ Robert H. Weiss

ROBERT H. WEISS
265 Stonywell Court
Dix Hills, NY 11746
(516) 983-7560
roberthw119@msn.com

## **COUNSEL FOR MICHAEL ASHLEY**

Dated:, 2017	So Ordered:
	Joanna Seybert, U.S.D.J.